

### REMARKS/ARGUMENTS

Claims 1, 10 and 19 are amended herein. Claims 1-27 are pending. No new matter has been added as a result of the Claim amendments.

#### 35 U.S.C. § 103 Rejections

Claims 1-5 and 8-9 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Arkko et al., (U.S. Patent 6,535,517), hereinafter referred to as "Arkko" in view of Fitzgerald et al. (5581764), hereinafter referred to as "Fitzgerald." Applicants have reviewed the cited references and respectfully submit that Arkko in view of Fitzgerald does not teach or render obvious the claim features of Claims 1-5 and 8-9.

Applicants respectfully state that Claim 1 includes the features "A method for managing a switched network infrastructure comprising:

storing an expected network infrastructure description of a network having a switched infrastructure without requiring hubs, said network having a data center;

comparing said expected network infrastructure description with a current network infrastructure description, wherein said comparing detects any new devices in the network infrastructure, any changed configuration of devices in the network including hardware, software or firmware configuration changes, and any devices or device interfaces that have been removed or have failed in the network;

outputting a result of said comparing to an operation terminal at said data center, wherein only differences between said expected network infrastructure description and said current network infrastructure description are displayed; and

providing said result in a user accessible format on said operation terminal at said data center operation for utilization by a data center operator." Support for the claimed feature can be found throughout the Figures and Specification including page 8 lines 15-26, page 10 lines 5-23, page 13 lines 22-30, page 15 line 20 through page 16 line 5 and Figure 4. (Claims 10 and 19 include similar features).

Applicants respectfully agree with the Examiner that they do not understand Arkko to teach or suggest detecting any changed configurations of devices in the network. Furthermore, Applicants do not understand Arkko to teach or suggest detecting any changed configuration of devices in the network including hardware, software or firmware configuration changes (emphasis added).

Applicants have reviewed Fitzgerald and do not understand Fitzgerald to overcome the shortcomings of Arkko. Specifically, Applicants understand Fitzgerald to teach configuration of a desktop computer and specifically, should have and already have configurations of the software thereon. Applicants do not understand Fitzgerald to teach or suggest detecting any changed configuration of devices in the network including hardware, software or firmware configuration changes (emphasis added).

For this reason, Applicants respectfully submit that Arkko in view of Fitzgerald do not teach or render obvious the features of Independent Claim 1 and as such Claim 1 is in condition for allowance.

Furthermore, Applicants have reviewed Arkko and do not understand Arkko to teach or render obvious the feature of “outputting a result of said comparing to an operation terminal at said data center, wherein only differences between said expected network infrastructure description and said current network infrastructure description are displayed; and providing said result in a user accessible format on said operation terminal at said data center operation for utilization by a data center operator” (emphasis added).

Applicants understand Arkko to combine dynamic connectivity information with expected connectivity information to enable the detection of faulty devices. For example, Applicants understand Arkko to teach that when a deviation from expected connectivity occurs, the deviation can be detected and responses taken either to avoid attempting to use a faulty device and/or to notify a network operator of the faulty device. That is, Applicants understand Arkko to notify a network

operator of a faulty device based on an expected network topology (e.g., the number and/or location of the processing devices) that is initially specified.

However, Applicants do not understand Arkko to teach or render obvious notifying a network operator of changes that are not faulty devices. That is, Applicants do not understand Arkko to teach outputting a result of said comparing to an operation terminal at said data center, wherein only differences between said expected network infrastructure description and said current network infrastructure description are displayed... wherein the detected devices may new devices in the network infrastructure, any changed configuration of devices in the network including hardware, software or firmware configuration changes, and any devices or device interfaces that have been removed or have failed in the network.

Applicants have reviewed Fitzgerald and do not understand Fitzgerald to overcome the shortcomings of Arkko. Specifically, Applicants understand Fitzgerald to teach away from a data center. Applicants understand Fitzgerald to teach that different departments often have different needs, and the challenge of centralized management increases as individual users within departments are able to specify their individual needs with greater particularity. Thus, the managers of networks of distributed desktop computers increasingly are being called upon to support a wide range of end-user involvement with the desktop, most notably the productivity enhancements of personalized desktop computing.

In contrast, the claimed features clearly teach the outputting a result of said comparing to an operation terminal at said data center, wherein only differences between said expected network infrastructure description and said current network infrastructure description are displayed; and providing said result in a user accessible format on said operation terminal at said data center operation for utilization by a data center operator.” (Emphasis added)

For this additional reason, Applicants respectfully submit that Arkko in view of Fitzgerald do not teach or render obvious the features of Independent Claim 1 and as such Claim 1 is in condition for allowance.

With respect to Claims 2-5 and 8-9, Applicants respectfully point out that Claims 2-5 and 8-9 depend from the allowable Claim 1 and recites further features of the present claimed invention. Therefore, Applicants respectfully state that Claims 2-5 and 8-9 are allowable as pending from an allowable base Claim.

#### Claims 6-7

Claims 6 and 7 are rejected under 35 U.S.C. § 103 (a) as being obvious over Arkko in view of Fitzgerald and further in view of Benfield et al., (U.S. Pub. No. 2003/0009552 A1), hereinafter referred to as "Benfield." Applicants have reviewed the cited reference and respectfully submit that the present invention is not rendered obvious over Arkko in view of Fitzgerald and further in view of Miyake for the following rationale.

With respect to Claims 6 and 7, Applicants respectfully point out that Claims 6 and 7 depend from the allowable Claim 1 and recites further features of the present claimed invention. Therefore, Applicants respectfully state that Claims 6 and 7 are allowable as pending from an allowable base Claim.

#### Claims 10-16, 18, 19-25 and 27

Claims 10-16, 18, 19-25 and 27 are rejected under 35 U.S.C. § 103 (a) as being obvious over Arkko in view of Aoyagi et al. (2002/0032761 A1) hereinafter referred to as "Aoyagi, and in further view of Ootani et al., (2002/0135610), hereinafter referred to as "Ootani." Applicants have reviewed the cited reference and respectfully submit that the present invention is not rendered obvious over Arkko in view of Aoyagi and in further view of Ootani for the following rationale.

Applicants respectfully state that Claim 19 includes the features "A computer-usable medium having computer-readable program code embodied therein for causing a computer system to perform a method for managing a switched network infrastructure comprising:

storing an expected network infrastructure description as an XML data type description of a network having a switched infrastructure without requiring hubs, said network having a data center,

said description comprising a device name and at least one configuration attribute for each device of said expected switched network infrastructure;

comparing said expected network infrastructure XML data type description with a current network infrastructure XML data type description comprising a device name and at least one configuration attribute for each device of said current network infrastructure, wherein said comparing detects any new devices in the network infrastructure, any changed configuration of devices in the network including hardware, software or firmware configuration changes, and any devices or device interfaces that have been removed or have failed in the network;

outputting a result of said comparing to an operation terminal at said data center, wherein only differences between said expected network infrastructure description and said current network infrastructure description are displayed; and

providing said result in a user accessible format on said operation terminal at said data center operation for utilization by a data center operator.” Support for the claimed feature can be found throughout the Figures and Specification including page 8 lines 15-26, page 10 lines 5-23, page 13 lines 22-30, page 15 line 20 through page 16 line 5 and Figure 4. (Claim 10 includes similar features).

Applicants respectfully agree with the Examiner that they do not understand Arkko to teach or suggest detecting any changed configurations of devices in the network. Furthermore, Applicants do not understand Arkko to teach or suggest detecting any changed configuration of devices in the network including hardware, software or firmware configuration changes (emphasis added).

Applicants have reviewed both Aoyagi and Ootani and do not understand Aoyagi and/or Ootani to overcome the shortcomings of Arkko. Specifically, Applicants do not understand Aoyagi and Ootani either alone or in conjunction to teach or anticipate the features of detecting any changed configuration of devices in the network including hardware, software or firmware configuration changes (emphasis added).

For this reason, Applicants respectfully submit that Arkko in view of Aoyagi and in further view of Ootani do not teach or render obvious the features of Independent Claims 10 and 19 and as such Claim 10 and 19 are in condition for allowance.

Furthermore, Applicants have reviewed Arkko and do not understand Arkko to teach or render obvious the feature of “outputting a result of said comparing to an operation terminal at said data center, wherein only differences between said expected network infrastructure description and said current network infrastructure description are displayed; and providing said result in a user accessible format on said operation terminal at said data center operation for utilization by a data center operator.” (Emphasis added)

Applicants understand Arkko to combine dynamic connectivity information with expected connectivity information to enable the detection of faulty devices. For example, Applicants understand Arkko to teach that when a deviation from expected connectivity occurs, the deviation can be detected and responses taken either to avoid attempting to use a faulty device and/or to notify a network operator of the faulty device. That is, Applicants understand Arkko to notify a network operator of a faulty device based on an expected network topology (e.g., the number and/or location of the processing devices) that is initially specified.

However, Applicants do not understand Arkko to teach or render obvious notifying a network operator of changes that are not faulty devices. That is, Applicants do not understand Arkko to teach outputting a result of said comparing to an operation terminal at said data center, wherein only differences between said expected network infrastructure description and said current network infrastructure description are displayed... wherein the detected devices may new devices in the network infrastructure, any changed configuration of devices in the network including hardware, software or firmware configuration changes, and any devices or device interfaces that have been removed or have failed in the network.

Applicants have reviewed Aoyagi and Ootani and do not understand Aoyagi and Ootani to overcome the shortcomings of Arkko. Specifically, Applicants understand Aoyagi and Ootani to

remain silent on the use of a data center, much less the features of outputting a result of said comparing to an operation terminal at said data center, wherein only differences between said expected network infrastructure description and said current network infrastructure description are displayed. Wherein the detected devices may new devices in the network infrastructure, any changed configuration of devices in the network including hardware, software or firmware configuration changes, and any devices or device interfaces that have been removed or have failed in the network

For this additional reason, Applicants respectfully submit that Arkko in view of Aoyagi and in further view of Ootani do not teach or render obvious the features of Independent Claims 10 and 19 and as such Claim 10 and 19 are in condition for allowance.

With respect to Claims 11-16 and 18, Applicants respectfully point out that Claims 11-16 and 18 depend from the allowable Claim 10 and recites further features of the present claimed invention. With respect to Claims 20-25 and 27, Applicants respectfully point out that Claims 20-25 and 27 depend from the allowable Claim 19 and recites further features of the present claimed invention. Therefore, Applicants respectfully state that Claims 11-16, 18, 20-25 and 27 are allowable as pending from allowable base Claims.

#### Claims 17 and 26

Claims 17 and 26 are rejected under 35 U.S.C. § 103 (a) as being obvious over Arkko in view of Aoyagi in view of Ootani and further in view of Fitzgerald. Applicants have reviewed the cited reference and respectfully submit that the present invention is not rendered obvious over Arkko in view of Aoyagi in view of Ootani and further in view of Fitzgerald for the following rationale.

With respect to Claim 17, Applicants respectfully point out that Claim 17 depends from the allowable Claim 10 and recites further features of the present claimed invention. Therefore, Applicants respectfully state that Claim 17 is allowable as pending from an allowable base Claim.

With respect to Claim 26, Applicants respectfully point out that Claim 26 depends from the allowable Claim 19 and recites further features of the present claimed invention. Therefore, Applicants respectfully state that Claim 26 is allowable as pending from an allowable base Claim.



CONCLUSION

In light of the above amendments and remarks, the Applicants respectfully request reconsideration of the rejected Claims.

Based on the arguments presented above, the Applicants respectfully assert that Claims 1-27 overcome the rejections of record and, therefore, the Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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Date: \_\_\_\_\_

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